RECEIVED

OCT 20 1992

Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Revision of Part 15 of the	)	
Rules to harmonize the standards	)	ET Docket No. 92-152
for digital devices with	)	
international standards.	)	

To: the Commission

COMMENTS OF HEWLETT-PACKARD COMPANY - OCT. 16, 1992

Hewlett-Packard Company ("HP") hereby submits its comments in response to the Commission's Notice of Proposed Rulemaking, ET Docket No. 92-152, released July 30, 1992.

HP is a manufacturer of measurement and computation devices and systems. The company's products and services are used in industrial, business, engineering, scientific, medical, and education settings in over 93 countries around the world. A large portion of HP's computational products are designed to operate worldwide without further modification, i.e., without power supply selection.

SUMMARY

HP strongly supports the Commission's efforts to provide an international harmonization approval path for U.S. manufacturers of Information Technology Equipment ("ITE"). A speedy adoption by the Commission of a CISPR 22 qualification path will provide immediate and substantial benefits throughout HP and to a wide spectrum of U.S. industry as well. In addition, HP believes the Commission should continue to provide, as has been proposed, a second path for compliance, maintaining the current Part 15 requirements for manufacturers who plan to sell a product only into the U.S. domestic market. This either/or approach presented by the Commission and originally proposed by CBEMA is an ideal compromise for international harmonization. Finally, HP hopes the Commission will take speedy action in the implementation of the harmonized requirements so that HP and other global companies may realize the product development benefits in a timely fashion.

HARMONIZED TEST REQUIREMENTS WILL MEAN FASTER TIME TO MARKET AND INCREASED INTERNATIONAL COMPETITIVENESS

A harmonized FCC limit/distance will lead to a 50% reduction in radiated interference test time at many HP manufacturing sites. This test time reduction will immediately result in decreased time to market for HP products. This benefit is realized with absolutely no incremental design, development, or certification cost.

Those companies within the EEC who only sell within Europe now enjoy a test effort advantage of 50%. The Commission's proposal will improve the competitive position of the U.S. computer industry against those overseas manufacturers who only test at one distance, i.e., 10 meters. The prospect of decreased time to market plus the competitive advantage of testing at only one distance results in a more efficient penetration of major worldwide markets by U.S. companies.

TEST FACILITIES/RESOURCE SAVINGS

Long term savings are possible for American companies that market products globally and who normally maintain both 3 and 10 meter test sites. Harmonization to CISPR 22 with the resultant 10 meter EUT to antenna distance will lead to 10 meter only facilities. A test distance of 10 meters for both Class B and A products is needed to support this 10 meter only measurement distance. The single measurement distance will result in fewer dollars spent on cable, power, and turntable installations.

Below 1 GHz, HP supports the Commission's proposal to not allow a submitter to utilize more than one limit/distance; at these frequencies it is appropriate to require a submitter to choose either Part 15 or "CISPR 22" requirements. Above 1 GHz, current Part 15 requirements should continue to be in force as there currently are no CISPR requirements. At frequencies above 1 GHz, HP proposes that the FCC utilize a 10 meter limit/distance requirement for three reasons: (1) Consistency with 30 MHz to 1000 MHz measurement procedures, (2) Better receive antenna aperture which provides better consistency of measured receive data, and (3) a 3 meter distance would require two measurement distances for some products; this will eliminate the benefits described in the previous section.

TEST PROCEDURES

ANSI C63.4 documents a well thought out, industry consensus procedure for testing of ITE products. In addition, recent activity of CISPR Subcommittee G leverages heavily on the C63.4 working group[1]. HP's believes that the cross pollination of CISPR/G and ANSI C63.4 will lead to harmonized test procedures. For the short term, HP therefore proposes that the Commission continue to utilize C63.4 as a measurement methodology procedure until CISPR 22 becomes more fully developed in this area. The Commission's goal should then be to achieve harmonization of procedures with CISPR through the continuing joint effort of the FCC staff and the ANSI standards writing activity.

PROPOSED CISPR 22 AMENDMENTS

HP urges the commission to adopt the proposed amendment CISPR/G(CO)9 (changing the limit/distance for Class A ITE) in the initial FCC rulemaking. Measurements at 10 meters are exceptionally easier to make than measurements at 30 meters when the test site is located in an urban area.

FCC LEADERSHIP POSITION

HP further proposes that the United States "CISPR 22" harmonized federal regulations present a leadership position by relaxing the Class B radiated limit between 30 and 230 MHz to 34 dBuV[2]. This change would be in step with CISPR/G(Sec)38, a proposed amendment to CISPR Publication 22. This level is a more reasonable, achievable value that would continue to provide interference protection to users of licensed broadcast services in this country as has been the case in Germany.

SYSTEMS INTEGRATION ISSUES

HP understands that certain systems integrators are opposed to 10 meter testing because of a fear that it will curtail the availability of 3 meter qualified ITE peripherals. Even if this fear is well founded, and HP believes it is not, the long term benefit of international harmonization for American companies far outweighs any possible inconvenience of having a dual qualification path for ITE equipment suppliers. Domestic companies who design their products to only meet Part 15 requirements should not stand in the way of international marketing efficiencies for exporting

[1]See CISPR/G(Central Office)14, Annex X Site attenuation measurement procedure for other test sites.
[2]ITE equipment have been performing successfully without causing interference in Germany at this level per document Vfg 1046/1984.

companies such as HP. Regulatory requirements should not artificially prop up the market availability of peripherals designed solely for the 3 meter limit/distance; the Commission's proposal contained in docket 92-152 to allow either Part 15 compliance or CISPR 22 compliance is a fair plan to provide the best possible option for manufacturers and importers to choose from.

Further, the guidelines of OET Bulletin No. 62 (Rev. November 1990), paragraph 1.10 System integrators, should still apply for integrated systems consisting of (1) all Part 15 certified devices, (2) all "CISPR 22" devices, or (3) a mix of Part 15 and "CISPR 22" certified devices. The Commission need only look to its own rules for "non-interference" for correcting any possible interference problem.

Respectfully submitted,
Hewlett-Packard Company

By: Pat Rose
Pat Rose
Senior Quality Engineer

By: Dave Adams
Dave Adams
Corporate Product Regulations Manager

Hewlett-Packard Company
Corporate Product Regulations
3172 Porter Drive MS/29AJ
Palo Alto, California 94304
(415) 857-5057

ET92-152